



U.S. Department of Justice

United States Attorney
Southern District of New York

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The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 29, 2020

BY ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: *United States v. Eva Christine Rodriguez and Sergio Lorenzo Rodriguez*
20 Cr. 513 (AT)

Dear Judge Torres:

The Government respectfully submits this letter, with the defense's consent, to request a 30-day extension of the prosecution's time to complete our search of electronic devices seized from defendant Eva Christine Rodriguez's residence for data responsive to the search warrant issued, pursuant to Rule 41 of the Federal Rules of Criminal Procedure, in the Central District of California (the "CDCA Warrant"). A copy of the CDCA Warrant is attached hereto as Exhibit A. Unlike Rule 41 warrants used in the Southern District of New York, the CDCA Warrant requires the Government to complete its search for data responsive to the CDCA Warrant within 120 days of the date of the Warrant, unless the 120-day period is extended by a Court with jurisdiction. Specifically, the CDCA Warrant provides:

The search team shall complete the search as soon as is practicable but not to exceed 120 days from the date of execution of the warrant. The government will not search the digital device(s) and/or forensic image(s) thereof beyond this 120-day period without obtaining an extension of time order from the Court.

CDCA Warrant, Section B, at 6. The 120-day period expired on December 24, 2020, and the search team has paused searching. Given the volume of electronic evidence in this case, the Government requests an additional 30 days from the date of this letter, to January 27, 2021, to search the electronic devices seized from Eva Christine Rodriguez's residence for responsive data.

With Ms. Rodriguez's consent, the Government has already produced a copy of all data from the devices at issue to both defendants as part of discovery.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney
Southern District of New York

By: /s/ Sarah Lai
Sarah Y. Lai
Assistant United States Attorney
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SO ORDERED.

Dated: December 29, 2020
New York, New York



ANALISA TORRES
United States District Judge